

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ADA N. LOPEZ, et al.
Plaintiffs

v.

CIVIL NO. 19-1219 (DRD)

UNITED STATES OF AMERICA
Defendant

v.

HOSPITAL HIMA SAN PABLO
Third Party Defendant

MOTION REQUESTING LEAVE TO FILE EXPERT REPORTS

TO THE HONORABLE COURT:

COMES NOW Defendant / Third Party Plaintiff, the United States, through undersigned counsel, and respectfully states and prays:

1. This Honorable Court set a Settlement Conference for September 21, 2021.
2. Defendant's expert witnesses are *Dr. Alberto de la Vega*, MD, FACOG, RDMS – Obstetrics, Gynecology and Obstetric Sonography and *Dr. Mark Steven Scher*, Pediatric Neurologist.
3. The parties had agreed to hold the pending discovery, including the retaining of an economic expert witness by Defendant, until the parties end their settlement negotiations, if they are unable to reach an agreement. (ECF No. 66 and 67.)
4. Defendant respectfully submits that it would benefit the settlement negotiations if this Court could review the expert reports, for what we respectfully request leave to file, for participants only.

WHEREFORE Defendant respectfully prays this Honorable Court to allow to file the expert witnesses' reports, for participants only, in order to aid this Court and the parties in the Settlement Conference.

I HEREBY CERTIFY that a copy of the foregoing was filed with the Clerk of the Court using CM/ECF system, who will send notification of such filing to counsel of record.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico, this 1st day of September 2021.

W. Stephen Muldrow
United States Attorney

s/Lisa E. Bhatia Gautier
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